

**REMARKS**

**I. Formal Matters**

Claims 1-8 are pending in the Application. Claim 1 is independent.

**II. Claim Rejections Under 35 U.S.C. § 102**

The Examiner has rejected claims 1-5, 7, and 8 under 35 U.S.C. § 102(e) as allegedly being anticipated by Sharif et al. (US 2003/0115167). Applicant submits the following in traversal.

Regarding claim 1, the Examiner appears to contend that the four arrow or direction keys 256b of Sharif correspond with the shift direction input means of claim 1, and that the ten numeric keys 256a, pound key 256c, star key 256d, and select key 256e of Sharif correspond with the command input means of claim 1. Assuming *arguendo* there is some correspondence, Applicant submits that the rejection of claim 1 over Sharif is not supported for at least the following reasons.

In Sharif, an Internet appliance uses a user interface device (Figure 23) to interact with a web browser application that functions in one of two primary modes: Navigation mode and Browse mode. In Navigation mode, a web page can be selected using the user interface device, and in Browse mode, the contents of a selected web page are viewed. *See* Sharif ¶ [0008]. Depending on the current mode, each key on the user interface device is associated with a command icon and/or interface element found on the screen. *See* Sharif ¶ [0008]. In particular, depending on the mode in Sharif, the screens provide different command bars at the top and bottom of the screen. *See* Sharif FIGS. 4, 5. The available commands on the command bars are

associated with different numeric keys on the user interface device. For example, in Navigation mode, the numeric key 1 is associated with the “Recent/Marked/Recommended” command, whereas in Browse mode the numeric key 1 is associated with the “Next” command. *See Sharif ¶¶ [0067], [0097].*

In Sharif, screens are broken up into screen areas, and only one screen area at a time has the “input focus” for interacting with the user interface device. *See Sharif ¶ [0040].* Sharif discloses, in paragraph [0040] (emphasis added), that:

1. When the input focus is on a button bar, the Left and Right arrow keys are use [sic] to change the currently-selected button, and the Select key is used to choose a mode or invoke a command (when the input focus is in the top or bottom button bars, respectively). When the input focus is on the primary area, any interface elements (such as links) available in that area may be **similarly selected and invoked using the arrow and Select keys.**

In other words, in Shariff, the arrow and select keys function in the same way, regardless of the input focus, to select and invoke an item. Moreover, pressing the pound key on the user interface device in Sharif rotates the input focus between the button bars and the primary display area. *See Sharif ¶ [0040].* Pressing the star key when in Browse mode rotates between frames containing HTML content. *See Sharif ¶ [0077].* Even though the numeric keys in Sharif execute different commands in Navigation mode versus Browse mode, Applicant submits that the various keys in the user interface device of Sharif do not manipulate displayed pages differently depending on whether the current mode is Navigation or Browse.

Claim 1 recites in part that “said control means ... **assigns different functions to said shift direction input means ... depending on the mode ... as functions of manipulating the page displayed on said display means,**” as recited in claim 1. Even assuming *arguendo* that the arrow or direction keys of Sharif correspond with the shift direction input means of claim 1, and that Navigation and Browse modes of Sharif correspond with the modes of claim 1, Sharif does not disclose that pages are manipulated differently by the arrow or directions keys depending on the mode, as recited in claim 1. The Examiner contends that the user may navigate horizontally or vertically depending on mode. *See* Office Action pg. 3. Even assuming *arguendo* this is disclosed in Sharif, Applicant submits that the left and right keys would be involved in horizontal navigation, and the up and down keys would be involved in vertical navigation, regardless of the mode. It is the layout of a page that differs depending on the mode in Sharif, not the way the page is manipulated by the particular arrow keys.

Additionally, claim 1 recites in part that “said control means ... **assigns different functions to ... said command input means depending on the mode ... as functions of manipulating the page displayed on said display means.**” Even assuming *arguendo* that the ten numeric keys 256a, pound key 256c, star key 256d, and select key 256e of Sharif correspond with the command input means of claim 1, these keys in Sharif can execute a different command depending on the current mode, but Applicant submits that they do not serve to manipulate pages differently depending on mode, as recited in claim 1. The Examiner contends that in browse mode, the primary buttons are Next, Prev, Back, and Scroll, while in zoom mode, the function of these keys is Back, Full, Z out, Z in, and Save. *See* Office Action pg. 3. Even assuming *arguendo* that different commands are assigned to the keys on the user interface device of Sharif depending on the mode, Applicant submits that the keys do not manipulate the page differently

depending on the mode, as recited in claim 1. Instead, the keys on the user interface device of Sharif merely execute different commands depending on the mode.

Further, claim 1 recites “wherein one of the plurality of operation modes includes a **surf mode of selecting part of the page by moving a mouse cursor displayed on said display means** in response to the shift command from said shift direction input means.” The Examiner cites the “X” in paragraph [0121] of Sharif as disclosing these features of claim 1. *See* Office Action pg. 4. This passage of Sharif discloses, however, that “the browser **does not use a mouse pointer.**” *See* Sharif ¶ [0121] (emphasis added). Instead, when a link image marked as a server-side image map is selected, the input focus is transferred to the image. A grid with a given number of squares (such as 10x10) is superimposed on the image, and an X is moved within the grid over the image. Applicant submits, however, that Sharif does not disclose selecting part of the page by moving a mouse cursor, as recited in claim 1.

For at least these reasons, Applicant submits that claim 1 is patentable over Sharif.

Regarding claims 2-8, which ultimately depend from independent claim 1, Applicant submits that these claims are patentable at least by virtue of their dependency. Applicant also submits that claims 2-8 are patentable at least by virtue of the additional features recited therein.

### **III. Claim Rejections Under 35 U.S.C. § 103**

The Examiner has rejected claim 6 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Sharif et al. (US 2003/0115167) in view of Pu et al. (US 2001/0056325).

Claim 1 is patentable over Sharif for at least the reasons submitted above. Furthermore, Pu fails to cure the deficiencies of Sharif. As such, Applicant submits that claim 6 is patentable at least by virtue of its dependency from claim 1.

**IV. Newly Added Claims**

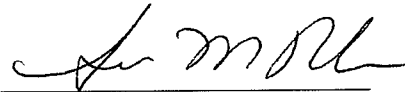
By this Amendment, Applicant has added claims 9-18 to provide more varied protection of the present invention. Claims 9-17 are patentable at least by virtue of their dependency upon claim 1 and claim 18 is patentable for at least analogous reasons as claim 1.

**V. Conclusion**

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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